

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: JOANN INC., ¹ Post-Effective Date Debtor.)))))))	Chapter 11 Case No. 25-10068 (CTG) Re: Docket No. 1860
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**CERTIFICATION OF COUNSEL REGARDING APPROVAL OF JOINT
STIPULATION REGARDING CLAIMS OF B33 SHOPS AT CENTERPOINT III LLC**

Ann Aber, solely in her capacity as the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned case, and B33 Shops at Centerpoint III LLC (“Landlord” and together with the Plan Administrator, collectively, the “Parties”), entered into a stipulation and hereby certify as follows:

1. The Landlord’s lease was rejected effective May 31, 2025.
2. On or about August 6, 2025, Landlord filed a Proof of Claim designated as Claim No. 19765. Claim No. 19765 asserts a claim totaling \$39,269 as an administrative expense claim.
3. As of the date of this Certification, Claim No. 19765 has been partially paid, pending receipt of appropriate documentation, which was recently provided to the Plan Administrator following the filing of an objection by the Plan Administrator.
4. Plan Administrator and Landlord hereby agree to resolve the remaining amounts owed in Claim No. 19765 by the allowance and payment of \$8,488.61 as an administrative expense claim, and further agree that upon Landlord’s receipt of such payment, Claim No. 19765 shall be deemed withdrawn with prejudice.

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

5. This Stipulation resolves *Plan Administrator's Seventeenth (Substantive) Omnibus Objection to Certain Claims (Unliquidated Claims and Overstated Claims)* [Docket No. 1860] (the "Overstated Objection") solely as to Claim No. 19765. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order in respect of the Overstated Objection that is consistent with this Stipulation.

6. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord.

7. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the "Proposed Order").

8. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

9. Accordingly, the Parties request entry of the Proposed Order attached hereto as **Exhibit A** at the Court's earliest convenience.

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Dated: January 9, 2026
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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